#### PRIVACY POLICY

This Website collects some **Personal Data** from its Users.

Gaming Zombies ("Owner", "we", "us", or "our") operates <u>www.gamingzombies.com</u> (hereinafter referred to as "Service").

Our Privacy Policy governs your visit to www.gamingzombies.com, and explains how we collect, safeguard and disclose information that results from your use of our Service.

We use your data to provide and improve Service. By using Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Our Terms and Conditions ("Terms") govern all use of our Service and together with the Privacy Policy constitute your agreement with us ("agreement").

This document can be printed for reference by using the print command in the settings of any browser.

#### **DEFINITIONS AND LEGAL REFERENCES**

**Service** - the www.gamingzombies.com website operated by Gaming Zombies.

**This Website (or this Application)** - The property that enables the provision of the Service.

**Personal Data** - data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

**Usage Data** - data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).

**Cookies** - small files stored on your device (computer or mobile device).

**Data Controller** - a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your data.

**Data Processors (or Service Providers)** - any natural or legal juridical person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

**Data Subject** - any living individual who is the subject of Personal Data.

**User (or You)** - the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

#### INFORMATION COLLECTION AND USE

We collect several different types of information for various purposes to provide and improve our Service to you.

#### **Types of Data Collected**

#### **Personal Data**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data").

Personally identifiable information may include, but is not limited to:

- 1. Email address
- 2. First name and last name
- 3. Phone number
- 4. Address, Country, State/County, Province/County, ZIP/Postal code, City, Town, etc.
- 5. Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link in the received content. We may also use some personal data, including but not limited to order details such as designs, emails, and pictures – but excuding any and all payment and confidential information – for training purposes.

# **Usage Data**

We may also collect information that your browser sends whenever you visit our Service or when you access Service by or through any device ("Usage Data").

This Usage Data may include information such as your computer's Internet Protocol address (IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access this Service with a device, this Usage Data may include information such as the type of device you use, your device unique ID, the IP address of your device, your device operating system, the type of Internet browser you use, unique device identifiers and other diagnostic data.

# **Tracking Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- 1. Session Cookies: We use Session Cookies to operate our Service.
- 2. Preference Cookies: We use Preference Cookies to remember your preferences and various settings.
- 3. Security Cookies: We use Security Cookies for security purposes.
- 4. Advertising Cookies: Advertising Cookies are used to serve you with advertisements that may be relevant to you and your interests.

#### **Other Data**

While using our Service, we may also collect the following information: sex, age, date of birth, place of birth, passport details, citizenship, registration at place of residence and actual address, telephone number (work, mobile), details of documents on education, qualification, professional training, employment agreements, NDA agreements, information on bonuses and compensation, information on marital status, family members, social security (or other taxpayer identification) number, office location and other data.

#### **Use of Data**

Gaming Zombies uses the collected data for various purposes:

- 1. to provide and maintain our Service;
- 2. to notify you about changes to our Service;
- 3. to allow you to participate in interactive features of our Service when you choose to do so;
- 4. to provide customer support;
- 5. to gather analysis or valuable information so that we can improve our Service;
- 6. to monitor the usage of our Service;
- 7. to detect, prevent and address technical issues;
- 8. to fulfil any other purpose for which you provide it;
- 9. to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;
- 10. to provide you with notices about your account and/or subscription, including expiration and renewal notices, email-instructions, etc.;
- 11. to provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information;
- 12. in any other way we may describe when you provide the information;
- 13. for any other purpose with your consent.

#### **Retention of Data**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal

obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

#### **Transfer of Data**

Your information, including Personal Data, may be transferred to - and maintained on - computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside the United Kingdom and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United Kingdom and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Gaming Zombies will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

# **Disclosure of Data**

We may disclose personal information that we collect, or you provide:

- 1. Business Transaction.
  - a. If we or our subsidiaries are involved in a merger, acquisition or asset sale, your Personal Data may be transferred.
- 2. Other cases. We may disclose your information also:
  - a. to our subsidiaries and affiliates;
  - b. to contractors, service providers, and other third parties we use to support our business;
  - c. to fulfill the purpose for which you provide it;
  - d. for the purpose of including your company's logo on our website;
  - e. for any other purpose disclosed by us when you provide the information;
  - f. with your consent in any other cases;
  - g. if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.

# **Security of Data**

The security of your data is important to us, but no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your Data Protection Rights Under the General Data Protection Regulations (GDPR)

If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights, covered by the <u>General Data Protection Regulation</u> (GDPR).

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please email us at <a href="mailto:team@gamingzombies.com">team@gamingzombies.com</a>.

In certain circumstances, you have the following data protection rights:

- 1. the right to access, update or to delete the information we have on you;
- 2. the right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete;
- 3. the right to object. You have the right to object to our processing of your Personal Data;
- 4. the right of restriction. You have the right to request that we restrict the processing of your personal information;
- 5. the right to data portability. You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format;
- 6. the right to withdraw consent. You also have the right to withdraw your consent at any time where we rely on your consent to process your personal information;

Please note that we may ask you to verify your identity before responding to such requests. Furthermore, we may not able to provide this Service without some necessary data.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

### Our Policy on "Do Not Track" Signals:

This Website does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

### **Service Providers**

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide Service on our behalf, perform Service-related services or assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

# **Analytics**

We may use third-party Service Providers to monitor and analyze the use of our Service.

### CI/CD tools

We may use third-party Service Providers to automate the development process of our Service.

### **Behavioral Remarketing**

We may use remarketing services to advertise on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimise and serve ads based on your past visits to our Service.

### **Payments**

We may provide paid products and/or services within Service. In that case, we use third-party services for payment processing (e.g. payment processors).

We will not store or collect your payment card details. That information is provided directly to our third-party payment processors (<u>PayPal</u> and <u>Stripe</u>) whose use of your personal information is governed by their Privacy Policy.

These payment processors adhere to the standards set by PCI-DSS as managed by the <u>PCI Security</u> <u>Standards Council</u>, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

#### **Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

### **Children's Privacy**

Our Services are not intended for use by minors or those under the age of 18 (depending on your Jurisdiction).

We do not knowingly collect personally identifiable information from minors or those under the age of 18.

If you become aware that a Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

# **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via a prominent notice on our Service, prior to the change becoming effective and update the "Effective Date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

#### **Contact Us**

If you have any questions about this Privacy Policy, please contact us by email at <a href="mailto:team@gamingzombies.com">team@gamingzombies.com</a>.

#### **POLICY SUMMARY**

Personal Data collected for the following purposes and using the following services:

- 1. Advertising
  - a. Facebook Lookalike Audience, Google Ad Manager and Google Ads Similar audiences
    - i. Personal Data: Cookies; Usage Data
  - b. Pinterest Ads
    - i. Personal Data: Cookies
- 2. Analytics
  - a. Wordpress Stats, Facebook Ads conversion tracking (Facebook pixel) and Google Analytics
    - i. Personal Data: Cookies; Usage Data
- 3. Backup saving and management
  - a. Backup on Google Drive
    - i. Personal Data: various types of Data as specified in the privacy policy of the service
- 4. Contacting the User
  - a. Mailing list or newsletter
    - i. Personal Data: email address
- 5. Displaying content from external platforms
  - a. Google Fonts
    - i. Personal Data: Usage Data; various types of Data as specified in the privacy policy of the service
- 6. Handling payments
  - a. Stripe and PayPal
    - i. Personal Data: various types of Data as specified in the privacy policy of the service
- 7. Handling productivity related activity

- a. Gmail, G Suite, Google Docs and Google Sheets
  - i. Personal Data: email address
- 8. Interaction with data collection platforms and other third parties
  - a. JotForm widget
    - i. Personal Data: Cookies; Usage Data
  - b. Typeform widget
    - i. Personal Data: Cookies; email address; first name; last name; picture
- 9. Interaction with external social networks and platforms
  - a. PayPal button and widgets
    - i. Personal Data: Cookies; Usage Data
- 10. Managing data collection and online surveys
  - a. JotForm
    - i. Personal Data: Cookies; country; email address; first name; last name
  - b. Typeform
    - i. Personal Data: Cookies; country; Data communicated while using the service; email address; first name; last name
- 11. Platform services and hosting
  - a. WordPress.com
    - i. Personal Data: various types of Data as specified in the privacy policy of the service
- 12. Registration and authentication
  - a. WordPress.com Single Sign On and Log In with PayPal
    - i. Personal Data: various types of Data as specified in the privacy policy of the service
- 13. Registration and authentication provided directly by this Website
  - a. Direct registration
    - i. Personal Data: Cookies; email address
- 14. Remarketing and behavioral targeting
  - a. Facebook Custom Audience and Twitter Tailored Audiences
    - i. Personal Data: Cookies; email address
  - b. Facebook Remarketing, Google Ad Manager Audience Extension, Google Ads Remarketing and Twitter Remarketing
    - i. Personal Data: Cookies; Usage Data
- 15. SPAM protection
  - a. Google reCAPTCHA
    - i. Personal Data: Cookies; Usage Data
- 16. Tag Management
  - a. Google Tag Manager
    - i. Personal Data: Usage Data

### 17. Traffic optimization and distribution

- a. Cloudflare
  - i. Personal Data: Cookies; various types of Data as specified in the privacy policy of the service

# 18. User database management

- a. ActiveCampaign
  - i. Personal Data: Cookies; email address; various types of Data as specified in the privacy policy of the service

# Further information about Personal Data

### Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.

The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Website depends on the payment system used.

### **Contact information**

# **Owner and Data Controller:**

Loveday Marketing Limited with company number (09592451) and address (35-37 Ludgate Hill, Office 7, London, England, EC4M 7JN)

Owner contact email: team@gamingzombies.com

### **FULL POLICY**

#### **Types of Data Collected**

Among the types of Personal Data that this Website collects, by itself or through third parties, there are: Cookies; Usage Data; email address; first name; last name; picture; country; Data communicated while using the service.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure to provide this Data may make it impossible for this Website to provide its services. In cases where this Website

specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Website or by the owners of third-party services used by this Website serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

# **Mode and Place of Processing the Data**

### **Methods of Processing**

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

### **Legal Basis of Processing**

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations
  the Owner may be allowed to process Personal Data until the User objects to such processing
  ("opt-out"), without having to rely on consent or any other of the following legal bases. This,
  however, does not apply, whenever the processing of Personal Data is subject to European data
  protection law;
- 2. provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- 3. processing is necessary for compliance with a legal obligation to which the Owner is subject;
- 4. processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- 5. processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

#### **Retention Time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

### Therefore:

- 1. Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

# The Purposes of Processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or

third parties), detect any malicious or fraudulent activity, as well as the following: Traffic optimization and distribution, Displaying content from external platforms, Handling payments, Analytics, Platform services and hosting, Registration and authentication, Advertising, Backup saving and management, Contacting the User, Handling productivity related activity, Interaction with data collection platforms and other third parties, Interaction with external social networks and platforms, Managing data collection and online surveys, Registration and authentication provided directly by this Website, Remarketing and behavioral targeting, SPAM protection, Tag Management and User database management.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

# **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Advertising**

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Website, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. For more information, please check the privacy policies of the relevant services.

In addition to any opt-out feature offered by any of the services below, Users may opt out by visiting the Network Advertising Initiative opt-out page.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

# 1. Facebook Lookalike Audience

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on the location this Website is accessed from, that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of this Website or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

Users can opt out of Facebook's use of cookies for ads personalization by visiting this opt-out page.

# 2. Google Ad Manager

Google Ad Manager is an advertising service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from, that allows the Owner to run advertising campaigns in conjunction with external advertising networks that the Owner, unless otherwise specified in this document, has no direct relationship with. In order to opt out from being tracked by various advertising networks, Users may make use of Youronlinechoices. In order to understand Google's use of data, consult Google's partner policy.

This service uses the "DoubleClick" Cookie, which tracks use of this Website and User behavior concerning ads, products and services offered.

Users may decide to disable all the DoubleClick Cookies by going to: Google Ad Settings.

# 3. Google Ads Similar audiences

Similar audiences is an advertising and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from, that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of this Website.

On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising cookies by going to: Google Ad Settings.

### 4. Pinterest Ads (Pinterest, Inc.)

Pinterest Ads is an advertising service provided by Pinterest, Inc. that allows the Owner to run advertising campaigns on the Pinterest advertising network.

Users may opt out of behavioral advertising features through their device settings, their Pinterest personalization settings or by visiting the AdChoices opt-out page. Personal Data processed: Cookies.

# **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

5. Wordpress Stats (Automattic Inc.)

Wordpress Stats is an analytics service provided by Automattic Inc.

6. Facebook Ads conversion tracking (Facebook pixel)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on the location this Website is accessed from, that connects data from the Facebook advertising network with actions performed on this Website. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

# 7. Google Analytics

Google Analytics is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from, ("Google"). Google utilizes the Data collected to track and examine the use of this Website, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

### **Backup saving and management**

This type of service allows the Owner to save and manage backups of this Website on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to this Website.

### 8. Backup on Google Drive

Google Drive is a service to save and manage backups provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from.

### **Contacting the User**

### 9. Mailing list or newsletter (this Website)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Website. Your email address might also be added to this list as a result of signing up to this Website or after making a purchase.

### Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

## 10. Google Fonts (Google LLC)

Google Fonts is a typeface visualization service provided by Google LLC that allows this Website to incorporate content of this kind on its pages.

# **Handling payments**

Unless otherwise specified, this Website processes any payments by credit card, bank transfer or other means via external payment service providers. In general and unless where otherwise stated, Users are requested to provide their payment details and personal information directly to such payment service providers. This Website isn't involved in the collection and processing of such information: instead, it will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

### 11. Stripe (Stripe Inc)

Stripe is a payment service provided by Stripe Inc.

### 12. PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

# Handling productivity related activity

This type of service helps the Owner to manage tasks, collaboration and, in general, activities related to productivity. In using this type of service, Data of Users will be processed and may be retained, depending on the purpose of the activity in question.

These services may be integrated with a wide range of third-party services disclosed within this privacy policy to enable the Owner to import or export Data needed for the relative activity.

### 13. Gmail

Gmail is a service that manages email communication provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from. Such email communication is not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside this service for advertising purposes in any other way.

#### 14. G Suite

G Suite is an integrated suite of cloud-based productivity, collaboration and storage services provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from. Gmail or other G Suite services are not scanned by Google for advertising purposes. In addition, Google does not collect or use data inside these services for advertising purposes in any other way.

# 15. Google Docs

Google Docs is an online text-editing and collaboration service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from.

#### 16. Google Sheets

Google Sheets is an online spreadsheet and collaboration service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from.

### Interaction with data collection platforms and other third parties

This type of service allows Users to interact with data collection platforms or other services directly from the pages of this Website for the purpose of saving and reusing data.

If one of these services is installed, it may collect browsing and Usage Data in the pages where it is installed, even if the Users do not actively use the service.

# 17. JotForm widget (JotForm Inc.)

The JotForm widget is a service for interacting with the JotForm data collection platform provided by JotForm Inc.

# 18. Typeform widget (TYPEFORM S.L)

The Typeform widget is a service for interacting with the Typeform data collection platform provided by TYPEFORM S.L.

#### Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website.

The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

It is recommended to log out from the respective services in order to make sure that the processed data on this Website isn't being connected back to the User's profile.

# 19. PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

# Managing data collection and online surveys

This type of service allows this Website to manage the creation, deployment, administration, distribution and analysis of online forms and surveys in order to collect, save and reuse Data from any responding Users.

The Personal Data collected depends on the information asked and provided by the Users in the corresponding online form.

These services may be integrated with a wide range of third-party services to enable the Owner to take subsequent steps with the Data processed - e.g. managing contacts, sending messages, analytics, advertising and payment processing.

20. JotForm (JotForm Inc.)

JotForm is a form builder and data collection platform provided by JotForm Inc.

21. Typeform (TYPEFORM S.L)

Typeform is a form builder and data collection platform provided by TYPEFORM S.L.

# Platform services and hosting

These services have the purpose of hosting and running key components of this Website, therefore allowing the provision of this Website from within a unified platform. Such platforms provide a wide range of tools to the Owner – e.g. analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data.

Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

22. WordPress.com (Automattic Inc.)

WordPress.com is a platform provided by Automattic Inc. that allows the Owner to build, run and host this Website.

### Registration and authentication

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Website will be able to access some Data, stored by these third-party services, for registration or identification purposes.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; to find out more, please refer to the description of each service.

23. WordPress.com Single Sign On (Automattic Inc.)

WordPress.com Single Sign On is a registration and authentication service provided by Automattic Inc. and is connected to the WordPress.com network.

24. Log In with PayPal (PayPal Inc.)

Log In with PayPal is a registration and authentication service provided by PayPal Inc. and is connected to the PayPal network.

# Registration and authentication provided directly by this Website

By registering or authenticating, Users allow this Website to identify them and give them access to dedicated services. The Personal Data is collected and stored for registration or identification purposes only. The Data collected are only those necessary for the provision of the service requested by the Users.

# 25. Direct registration (this Website)

The User registers by filling out the registration form and providing the Personal Data directly to this Website.

# Remarketing and behavioral targeting

This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioral targeting activity.

Some services offer a remarketing option based on email address lists.

In addition to any opt-out feature provided by any of the services below, Users may opt out by visiting the Network Advertising Initiative opt-out page.

Users may also opt-out of certain advertising features through applicable device settings, such as the device advertising settings for mobile phones or ads settings in general.

### 26. Facebook Custom Audience

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on the location this Website is accessed from, that connects the activity of this Website with the Facebook advertising network.

Users can opt out of Facebook's use of cookies for ads personalization by visiting their opt-out page.

# 27. Facebook Remarketing

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. or by Facebook Ireland Ltd, depending on the location this Website is accessed from, that connects the activity of this Website with the Facebook advertising network.

#### 28. Google Ad Manager Audience Extension

Google Ad Manager Audience Extension is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from, that tracks the visitors of this Website and allows selected advertising partners to display targeted ads across the web to them.

### 29. Google Ads Remarketing

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from, that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

Users can opt out of Google's use of cookies for ads personalization by visiting Google's Ads Settings.

30. Twitter Remarketing (Twitter, Inc.)

Twitter Remarketing is a remarketing and behavioral targeting service provided by Twitter, Inc. that connects the activity of this Website with the Twitter advertising network.

31. Twitter Tailored Audiences (Twitter, Inc.)

Twitter Tailored Audiences is a remarketing and behavioral targeting service provided by Twitter, Inc. that connects the activity of this Website with the Twitter advertising network.

#### **SPAM** protection

This type of service analyzes the traffic of this Website, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

### 32. Google reCAPTCHA

Google reCAPTCHA is a SPAM protection service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from.

The use of reCAPTCHA is subject to the Google privacy policy and terms of use.

#### **Tag Management**

This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

### 33. Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on the location this Website is accessed from.

# Traffic optimization and distribution

This type of service allows this Website to distribute their content using servers located across different countries and to optimize their performance.

Which Personal Data are processed depends on the characteristics and the way these services are implemented. Their function is to filter communications between this Website and the User's browser.

Considering the widespread distribution of this system, it is difficult to determine the locations to which the contents that may contain Personal Information of the User are transferred.

# 34. Cloudflare (Cloudflare Inc.)

Cloudflare is a traffic optimization and distribution service provided by Cloudflare Inc.

The way Cloudflare is integrated means that it filters all the traffic through this Website, i.e.,
communication between this Website and the User's browser, while also allowing analytical data from
this Website to be collected.

# User database management

This type of service allows the Owner to build user profiles by starting from an email address, a personal name, or other information that the User provides to this Website, as well as to track User activities through analytics features. This Personal Data may also be matched with publicly available information about the User (such as social networks' profiles) and used to build private profiles that the Owner can display and use for improving this Website.

Some of these services may also enable the sending of timed messages to the User, such as emails based on specific actions performed on this Website.

35. ActiveCampaign (ActiveCampaign, Inc.)

ActiveCampaign is a User database management service provided by ActiveCampaign, Inc.

### **Further information about Personal Data**

#### Selling goods and services online

The Personal Data collected are used to provide the User with services or to sell goods, including payment and possible delivery.

The Personal Data collected to complete the payment may include the credit card, the bank account used for the transfer, or any other means of payment envisaged. The kind of Data collected by this Website depends on the payment system used.

#### The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following:

- 1. Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- 2. Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- 4. Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- 5. Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- 6. Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- 7. Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- 8. Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

# Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

# **Cookie Policy**

This Website uses Trackers. To learn more, the User may consult the <u>Cookie Policy</u>. Additional information about Data collection and processing

**Legal action** 

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information in the relevant section of this document.

**Legal information** 

This privacy statement has been prepared based on provisions of multiple legislations, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation).

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Effective Date: September 1, 2020